FDA Public Hearing

Promotion of FDA-Regulated Medical Products Using the Internet

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Testimony of

Interactive Advertising Bureau

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IAB

- Trade association of media and technology companies who sell online advertising
  - 375 companies
  - Search engines such as Google and Yahoo!
  - Major newspapers and broadcast networks
  - Health information websites such as Waterfront Media and Lifetime

IAB Standards

- Standard-setting organization for advertising on the Internet
  - IAB members provide 85% of online advertising in the U.S.

- Standards and guidance in many areas
  - Universal Ad Package
    - General formats
  - Online Behavioral Advertising Principles
    - Format and content for notices

Overview

- Internet as an interactive medium
- FDA policies regarding promotion
- Importance of standardization
- IAB standardization process

Internet as a Unique Medium

- FDA must consider unique character of Internet
  - Value of the medium
  - How it is used
  - Practical limitations inherent to the medium
  - Importance of including FDA-regulated information in the healthcare dialog

User Interaction

- Interactive
- User control – point and click
- Ease of movement to specific information
- Links
  - Different from and superior to print and broadcast references to other sources of information
  - Linkage to Package Insert or Brief Summary
  - Linkage to information required for fair balance
- Content Expansions
  - Pop-up, scroll, change in content or dimensions

Standardization of Presentation

- Standardization is important for optimal use and consumer understanding
- Assist consumers in finding and accessing the types of information required by law and by FDA policy
  - Especially risk information
- Goal would be optimal formats for providing information
  - Information that consumers want and need
  - Information meeting FDA regulatory requirements

Standards as Safe Harbors

- Importance of interaction with FDA regarding industry advertising standards
  - Application of traditional rules to Internet unclear
  - Uncertainty is bad for all parties
  - FDA needs to take creative approaches and provide workable guidance
  - Beneficial to have industry standards that provide mechanisms for meeting FDA standards

IAB Process

- IAB is not proposing standards today
  - IAB members here today discussing ideas and proposals
- IAB is initiating a process to draft standards
  - Formats for sponsored links, banner ads, and video presentations
  - Use of links and content expansion mechanisms (pop-ups, scrolls, etc.)
- Process
  - Participation by advertisers and advertising agencies
  - Public comment on draft proposals
  - Collaboration with FDA

IAB Objectives

- IAB hopes that FDA will find IAB's standardization effort useful in the agency's policy-making process

- IAB hopes to work with FDA
  - To better enable consumers to access and use FDA-regulated information and
  - To develop standards that will help assure advertisers that they are meeting FDA requirements